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9 Attorney for Defendant
10 ROSA LOPEZ MENDOZA

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14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE EASTERN DISTRICT OF CALIFORNIA

16 UNITED STATES OF AMERICA,) No. 1:05-cr-00127 OWW
17 Plaintiff,)
18 v.) STIPULATION TO MODIFY CONDITIONS OF
19) PRE-TRIAL RELEASE; AND ORDER
20) THEREON
21 ROSA LOPEZ MENDOZA,) Judge: Hon. Oliver W. Wanger
22 Defendants.)
23 _____)
24)

25 IT IS HEREBY STIPULATED by and between the parties hereto through their respective
26 counsel, VIRNA L. SANTOS, Assistant United States Attorney, counsel for Plaintiff, and ERIC V.
27 KERSTEN, Assistant Federal Defender, counsel for Defendant Rosa Lopez Mendoza, that the conditions
28 of release entered by the Magistrate Court on April 15, 2005, may be amended as follows: Rosa Loez
Mendoza is permitted to travel to Mexico beginning July 23, 2007, and she must return to the United
States no later than August 22, 2007. All other conditions of pre-trial release remain in full force and
effect.

25 This request is made to allow Ms. Lopez Mendoza to travel to Mexico to attend to the funeral of
26 her father, who passed away July 22, 2007.

27 This request is appropriate because, pursuant to the plea agreement of the co-defendant of Ms.
28 Lopez Mendoza, the government has agreed to dismiss the charges against Ms. Lopez Mendoza when the

1 co-defendant is sentenced on September 24, 2007. In addition, Ms. Lopez Mendoza has made all court
2 appearances and complied with the conditions of her pre-trial release for more than two years. Finally,
3 while her green card has been misplaced, she has requested a replacement card and obtained a temporary
4 I-551 which allows her to travel to Mexico and return to the United States between July 23, 2007 and
5 August 22, 2007.

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7 DATED: July 23, 2007

McGREGOR M. SCOTT
United States Attorney

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10 /s/ Virna L. Santos
11 VIRNA L. SANTOS
Assistant U.S. Attorney
Attorney for Plaintiff

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13 DATED: July 23, 2007

DANIEL J. BRODERICK
Federal Defender

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15 /s/ Eric V. Kersten
16 ERIC V. KERSTEN
17 Assistant Federal Defender
Attorney for Defendant

20 **ORDER**

21 **IT IS SO ORDERED.** The conditions of pre-trial release for defendant Rosa Lopez Mendoza are
22 hereby amended to allow her to travel to Mexico beginning July 23, 2007, and to return to United States
23 no later than August 22, 2007.

24 IT IS SO ORDERED.

25 Dated: July 23, 2007

/s/ Oliver W. Wanger
UNITED STATES DISTRICT JUDGE